

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

PHILIP EMERSON,

Petitioner,

V.

**JERRY PARKER; JANA E HOLLAND;
HOLLY LAKE RANCH ASSOCIATION,
INC.; and ANGELA ALBERS,**

Respondents.

Civil Action No. 6:21-cv-240

RESPONDENT ANGELA ALBERS' MOTION TO SUBSTITUTE COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

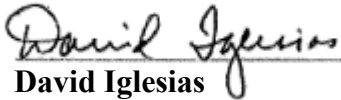
COMES NOW Angela Albers, Respondent in the above-styled and -referenced cause, and files this her Motion to Substitute Counsel, and would respectfully show unto the Court as follows:

Respondent is currently represented by David Iglesias of Iglesias Law Firm, PLLC. Ms. Albers respectfully requests that the Court permit the aforementioned attorney withdraw from his representation and substitute Robert Davis of Flowers Davis, PLLC, as her counsel for all purposes of this litigation. Robert Davis' contact information is as follows:

Robert S. Davis
Flowers Davis, P.L.L.C.
1021 ESE Loop 323, Suite 200
Tyler, Texas 75701
(903) 534-8063
(903) 534-1650 Facsimile
State Bar No. 05544200
rsd@flowersdavis.com

WHEREFORE, PREMISES CONSIDERED, Respondent Angela Albers respectfully requests that the Court grant her Motion to Substitute Counsel, and for any other relief, at law or in equity, to which she may show herself to be justly entitled.

Respectfully submitted,



David Iglesias

State Bar No. 24051733

david@iglesiaslawfirm.com

Lead Attorney

IGLESIAS LAW FIRM, PLLC

605 Chase Drive, Suite 8

Tyler, Texas 75701

Telephone: (903) 944-7185

Facsimile: (903) 630-5338

Dallas Office

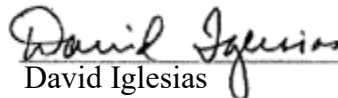
1412 Main Street, Suite 608

Dallas, Texas 75202

**COUNSEL FOR RESPONDENT, ANGELA
ALBERS**

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), Respondent is not required to confer with pro se
Petitioner regarding his position on this Motion.



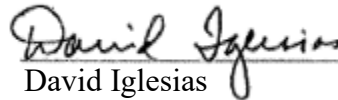
David Iglesias

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2023, a copy of the foregoing was served upon Pro Se Plaintiff by certified U.S. mail, returned receipt requested, at the following address:

Via CMRRR: 9414 8361 0426 2539 7360 47

Mr. Philip Emerson
112 Read Leaf Lane
Holly Lake Ranch, Texas 75765


David Iglesias